



LAX & NEVILLE LLP

BARRY R. LAX
BRIAN J. NEVILLE

SANDRA P. LAHENS
RAQUEL KRAUS
GABRIELLE J. PRETTO

OF COUNSEL
JANET K. DeCOSTA
WASHINGTON, DC OFFICE

August 14, 2015

By ECF, and Chambers' Email

Hon. Stuart M. Bernstein, U.S.B.J.
United States Bankruptcy Court for the
Southern District of New York
One Bowling Green
New York, New York 10004

**Re: *Securities Investor Protection Corporation v. Bernard L.
Madoff Investment Securities LLC, Adv. No. 08-1789 (SMB)***

Dear Judge Bernstein:

Our firm represents numerous Defendants in adversarial proceedings brought by Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (the "Trustee"), and we write to request an extension from the Court on the deadline for our firm to file Answers to the Trustee's Complaints in the following adversarial proceedings:

10-ap-4647 – Abbit Family Partnership
10-ap-4301 – Freida Bloom
10-ap-5036 – Elinor Felcher
10-ap-4289 – John and Gladys Fujiwara
10-ap-4655 – Jaffe Family Partnership
10-ap-4960 – Estate of Betty Kahn
10-ap-4954 – Ruth Kahn
10-ap-4900 – Bonnie Kansler
10-ap-5169 – Fairfield Pagma
10-ap-4756 – Steven and Sandra Kaye
10-ap-5204 – Francis Le Vine
10-ap-4573 – Bruce Leventhal 2001 Irrevocable Trust
10-ap-4481 – Armand Lindenbaum
10-ap-4881 – Jenna Livingston
10-ap-4304 – Elinor Solomon
10-ap-4307 – Howard Solomon
10-ap-4966 – Onesco

1450 BROADWAY, 35TH FLOOR, NEW YORK, NY 10018 T: 212.696.1999, F: 212.566.4531

INTERNATIONAL SQUARE, 1875 EYE STREET, NW, SUITE 500, WASHINGTON, DC 20006 T: 202.792.0101

LAXNEVILLE.COM



10-ap-4988 – David Wallenstein
10-ap-4467 – Wallenstein Partnership
10-ap-4616 – Nicolette Wernick
10-ap-5048 – Peng Yang

Our sole associate assigned to handle the cases, Gabrielle Pretto (“Ms. Pretto”), left our law firm last week. We are a small five (5) attorney law firm and Ms. Pretto was the sole contact for all of these cases. The Trustee’s counsel has mainly communicated with Ms. Pretto regarding these cases and knew her status as the sole associate and main contact person assigned to these cases. Ms. Pretto’s recent departure was sudden and has resulted in various obstacles that we are attempting to overcome. Based on these obstacles, we just learned this morning that Answers in the above-referenced matters are due Monday, August 17th, and immediately reached out to the Trustee’s counsel to request an extension. The Trustee’s counsel denied such extension request, and it would be impossible for our firm to file Answers on Monday since we need more time to draft the Answers, speak with our clients, and give them an opportunity to review the Answers prior to filing.

Given Ms. Pretto’s recent departure, we respectfully request a sixty (60) day extension to file Answers in the above adversarial proceedings. In the past, the Trustee has granted us extensions in the ordinary course and it is unprofessional for the Trustee’s counsel to deny an extension request at this time. Furthermore, the Trustee has granted extensions on the time to Answer for other Defendants in other adversarial proceedings. I am available for a conference call with your Honor at any time today.

Should you have any questions, please do not hesitate to contact our office.

Very truly yours,

/s/ **Brian J. Neville**
Brian J. Neville, Esq.